

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARKEACE ARQUE CANTY,  
a/k/a "Quake",

Defendant.

INDICTMENT CR13-110JNE/LIB

(18 U.S.C. § 1591(a))  
(18 U.S.C. § 1591(b)(2))  
(18 U.S.C. § 1594)  
(18 U.S.C. § 2252(a))  
18 U.S.C. § 2252(b)(1))

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**

(Conspiracy to Commit Sex Trafficking of a Child)

**Introduction**

At all times relevant to this Indictment,

1. Defendant MARKEACE ARQUE CANTY, a/k/a "Quake", was a resident of the State and District of Minnesota.

2. K.W. was a minor female who was born in 1995 and who also resided in the State and District of Minnesota.

**The Conspiracy**

3. Beginning in at least July of 2012, and continuing through in or about January, 2013, in the State and District of Minnesota and elsewhere the defendant,

MARKEACE ARQUE CANTY,  
a/k/a "Quake",

SCANNED

MAY 07 2013

U.S. DISTRICT COURT ST. PAUL

FILED MAY 06 2013  
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together with others known and unknown to the Grand Jury, did knowingly in and affecting interstate and foreign commerce, combine, conspire, confederate and agree to commit an offense against the United States, to wit: to recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, namely, K.W., and benefit financially and by receiving something of value from participation in a venture which engaged in the previously described acts, knowing and in reckless disregard of the fact that means of force, fraud, and coercion would be used to cause K.W. to engage in a commercial sex act, and knowing that K.W. had not attained the age of 18 and would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591(a) and 1591(b)(2).

**Manner and Means of the Conspiracy**

4. It was part of the conspiracy that defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", and others known and unknown to the Grand Jury, received monies and other things of value by having K.W. engage in commercial sex acts.

5. It was further part of the conspiracy that defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", and others known and unknown to the Grand Jury would and did purchase "escort" advertisements in the website Backpage.com. These advertisements included photographs of a young woman in lingerie, and included statements such as "I'm the Sweet Treat that I know you want." The advertisements specified that respondents to the advertisements should not be law enforcement. Phone numbers for contacts of these advertisements were registered to the MARKEACE ARQUE CANTY, a/k/a/ "Quake", as

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well as others known and unknown to the Grand Jury. The advertisements were placed for locations in and around Duluth, Minnesota, as well as multiple other locations within and without the State and District of Minnesota.

6. It was further part of the conspiracy that defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", would and did discuss monetary rates with the respondents of the advertisements on his cellular telephone.

7. It was further part of the conspiracy that defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", and others known and unknown to the Grand Jury, would and did drive K.W. to locations in Duluth, Minnesota, and Minneapolis, Minnesota, as well as multiple other locations within and without the State and District of Minnesota, in order to meet with respondents to the advertisements. K.W. would and did meet respondents to the advertisements in motels, where she engaged in commercial sexual acts in exchange for money.

8. It was further part of the conspiracy that defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", would and did attempt to arrange for the release of K.W., as well as other conspirators known and unknown to the Grand Jury, when they were arrested for state prostitution charges.

9. It was further part of the conspiracy that defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", and others known and unknown to the Grand Jury used vehicles, public highways, motels, and telephones and the internet to facilitate K.W.'s commercial sex acts.

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**Overt Acts**

10. In furtherance of the conspiracy, and to effect the objects thereof, defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", and others known and unknown to the Grand Jury, committed the following overt acts in the States and District of Minnesota and elsewhere:

a. On or about September 12, 2012, defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", served as a contact for an "escort" advertisement for "Northwest Indiana, Merrillville/Hammond & surrounding." The advertisement included photographs of a young woman in lingerie with the words "iTs PLAY TiMe BoYs," "Five-Star Experience," and "Unrushed, with a sweet sensual pleasing personality." The advertisement included a phone number registered to defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake". An undercover officer with the Sheriff's Department of Porter County, Indiana, responded to an advertisement as part of a prostitution sting operation. K.W. arrived at a motel room in Valparaiso, Indiana to meet the undercover officer. The undercover officer detained K.W. after K.W. agreed to perform sexual acts in exchange for \$200.00 an hour.

b. On or about December 24, 2012, in or about Duluth, Minnesota, the defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", negotiated via SMS message over his cellular telephone with a respondent to an "escort" advertisement the price for commercial sexual acts in exchange for money. Defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", initially told the respondent of the

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advertisement that the price would be \$200.00 an hour. Defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", then told the respondent to the advertisement that \$200.00 would not be worth the defendant's time, and that the respondent to the advertisement would need to send a picture of the respondent's penis to prove the respondent was not a "cop."

c. On or about December 26, 2012, in or about Duluth, Minnesota, defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", purchased a prepaid Visa card that was used to purchase an "escort" advertisement on the website Backpage.com.

d. On or about January 2, 2013, in or about Duluth, Minnesota, defendant MARKEACE ARQUE CANTY, a/k/a/ "Quake", purchased a prepaid Visa card that was used to purchase an "escort" advertisement on the website Backpage.com. The escort advertisement listed a telephone number owned and by K.W.

All in violation of Title 18, United States Code, Section 1594.

**COUNT 2**  
(Sex Trafficking of a Child)

11. Beginning in at least July of 2012, and continuing through in or about January, 2013, in the State and District of Minnesota and elsewhere the defendant,

**MARKEACE ARQUE CANTY,**  
a/k/a "Quake",

in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored,

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transported, provided, obtained, and maintained by any means a person, namely, K.W., and benefited financially and by receiving something of value from participation in a venture which engaged in the previously described acts, knowing and in reckless disregard of the fact that means of force, fraud, and coercion would be used to cause K.W. to engage in a commercial sex act, and knowing that K.W. had not attained the age of 18 and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a) and 1591 (b)(2).

**COUNT 3**

(Receipt of Child Pornography)

12. On or about January 15, 2013, in the State and District of Minnesota the defendant,

**MARKEACE ARQUE CANTY,**  
a/k/a "Quake",

did knowingly receive visual depictions using a means and facility of interstate commerce that had been mailed, shipped and transported in and affecting interstate and foreign commerce, by any means, including a computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such depictions are of such conduct, including, but not limited to, the following cellular phone video files:

- (a) image\_4.jpg;
- (b) image\_5.jpg; and
- (c) image\_6.jpg.

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All in violation of Title 18, United States Code, Sections 2252(a) and 2252 (b)(1).

**FORFEITURE ALLEGATIONS**

Counts 1-3 are hereby incorporated and realleged for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 1594 and 2253(a).

As a result of the offenses charged in Counts 1 and 2, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d):

(1) any property, real or personal, used or intended to be used to commit or to facilitate the commission of such offenses; and

(2) any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses.

As a result of the offense charged in Count 3, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(3):

(1) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property.

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If any of the above-described property is unavailable for forfeiture within the definition of Title 21, United States Code, Section 853(p), the United States intends to forfeit substitute property pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON